

7-7-87

ENFORCEMENT
CONFIDENTIAL

HW-113

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Stanley Roller
Mobil Oil Corporation
3800 W. Alameda Avenue, Suite 700
Burbank, California 91505-4331

Re: Harbor Island Superfund Site

Dear Mr. Roller:

The United States Environmental Protection Agency (EPA) has documented the release or threatened release of hazardous substances at the above referenced site. As a result, the site is now listed on the National Priorities List pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 (to be herein referenced as CERCLA), 42 U.S.C. Section 9601 et seq. EPA is considering spending public funds to further investigate the contamination at the site and take corrective action for control of hazardous substances at the site, unless it is determined that such action will be conducted properly by a responsible party.

Responsible parties under CERCLA include the current and past owner(s) or operator(s) of the site, and persons who generated the substances or were involved in the transport, treatment, or disposal of them at the site. Under CERCLA and other laws, Potentially Responsible Parties (PRPs) may be liable for all monies including interest thereon expended by the government to take necessary corrective action at the site including investigation, planning, and cleanup of the site. Use of the word "site" in this letter refers to the term "facility", as broadly defined in CERCLA.

United States EPA and the Washington State Department of Ecology (Ecology) encourage PRPs to perform or participate in the investigation and/or cleanup of the site. The PRPs may participate individually or as a group. In the event that PRPs elect not to participate, each PRP may be liable for site investigation, site cleanup, and for damages to natural resources. These liabilities are joint, strict, and several for all PRPs.

At this time, EPA is seeking to obtain additional information from you based on your responses dated August 8, 1986 and February 20, 1987. Under the provisions of federal law, specifically Section 104 of CERCLA, 42 U.S.C. 9604, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, as amended by the Solid Waste Disposal Act Amendments of 1980, the Administrator of the EPA has the authority to require any person who generates, stores, treats, transports, disposes, or otherwise handles or has handled hazardous wastes and substances to furnish information related to such wastes and substances.

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Pursuant to these statutory provisions, you are hereby requested to respond to the following items:

1. Mobil reported that two 1,000 gallon underground storage tanks used to store gasoline for company trucks were removed in 1986. If leaded gasoline was stored in these tanks prior to their removal, please indicate the name and/or chemical formulation of the gasoline additives used and the dates that each was used.
2. If leaded gasoline was stored in the two above referenced tanks, please describe the method(s) Mobil used to dispose of the storage tank bottom sludge and provide the name of the transporter and the disposal site if known. Were any tank bottoms "land-farmed" on Harbor Island?
3. Mobil indicated in its 104(e) response that a 12,000 gallon oil-water separator exists on the site. Please describe the method(s) Mobil uses to dispose of the separator sludge, the name of the transporter of the sludge and the disposal site if known.
4. If there is a fire suppression system on-site that requires hazardous substances and/or produces hazardous sludge, please describe the method(s) Mobil uses to dispose of the sludge produced, the name of the transporter, disposal site if known, and the method used to store the hazardous substances.
5. Does Mobil use any degreasers or chemicals to clean oiled equipment or vehicles on-site? If so, what are the name(s) or chemical formulation(s) of the chemicals or degreasers used? Please also indicate how and where these cleaners or degreasers are stored, the approximate quantity of each, and the dates the chemicals or degreasers have been used or stored on-site.
6. Mobil indicated in its 104(e) response that water is discharged from the oil-water separator under a NPDES permit. Has Mobil ever had any violations of that permit? If so, please indicate the date and the cause for the violation.
7. Please indicate the date that Mobil purchased the property located at parcel 7671800250 and the name of the previous owner.
8. As reported by Mobil, up until 1960 Mobil's operations included a gasoline truck loading rack, a garage, a tank farm, and lube blending plant. If these operations were not conducted on the property located at parcel 7671800250 please describe Mobil's operations on parcel 7671800250 up until 1960.
9. Does Mobil own a recovery well located on the west side of 13th Street on Harbor Island or any recovery wells on the lot in question?

10. Is there a leak detection system installed on the underground tank at the lube loading rack? If not, please describe Mobil's method for detecting leaks from this tank.
11. Mobil reported that in 1981 a truck owned and operated by Butler Construction overturned on the dock and spilled diesel fuel and engine oil. If the information is available please specify the volume of the spill, whether any of the diesel fuel or engine oil was recovered, and where the unrecovered portion of the spill was discharged.
12. Available information indicates that Mobil had a spill in the winter of 1985 or 1986 caused from bursting pipes. Please provide the following information regarding that spill: the volume of the spill, whether any of the spill was recovered, and where the remaining portion of the spill was discharged.
13. Describe all environmental investigations that have taken place on or around the facility. Include investigations of the physical and chemical characteristics of soil, surface water, sediments, air, and groundwater. Also include historical evaluations of potential and known contamination. Provide all relevant information including, but not limited to, study design, work plans, quality assurance procedures, sampling procedures, well logs, study results, and data analyses. Raw data need not be provided at this time; data summaries will suffice.
14. Is the oily residue from the oil-water separator stored on-site prior to disposal by Airo? If so, please indicate how and where it is stored and estimate the quantity.
15. Identify the number of bulk storage tanks on the property identified by King County, Washington, tax identification number 7671800250. How frequently are these tanks sandblasted and repainted? What type of sandblasting medium has been used? Where and how has the sandblasting medium been stored and disposed? In past years, have these tanks ever been painted with leaded paints?

Your written answers to these questions must be sent to EPA within 15 calendar days of your receipt of this letter. Your response should include all information you have for the site during the time you or your company owned, operated, or leased the property.

Under Section 3008 of RCRA, 42 U.S.C. 6928, failure to comply with this request may result in an order requiring compliance or a civil action for appropriate relief. Section 3008 of RCRA also provides for civil penalties. Pursuant to Section 103 of CERCLA, it is unlawful for any person knowingly to destroy, mutilate, erase, dispose, conceal, or otherwise render unavailable or unreadable, or falsify any of the above record.

EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations

Federal Register 36902-36924 (September 1, 1976), as amended by 43 FR 3997 (September 8, 1978), 44 FR 17673 (March 23, 1979), 43 FR 11270 (March 17, 1983), and 50 FR 51663 (December 18, 1985). For any portion of the information submitted that is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 CFR 2.203(b). EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

Note that all information (including information claimed confidential) will be disclosed to an EPA contractor for technical review and evaluation under contract #68-01-7351, Project No. 05-A005-46, Work Assignment #46. The prime contractor is Jacobs Engineering Group, Incorporated, and the subcontractor is Tetra Tech, Incorporated. The purpose for this disclosure is deemed necessary by EPA to carry out the requirements of CERCLA. This disclosure will be carried out in accordance with procedures defined in 40 CFR 2.2036(b). Please indicate in your response if you have a concern regarding such release of information. All other releases of information will also follow the procedures defined in 40 CFR Part 2, Subpart B.

Please respond to EPA within the timeframe indicated above. Your written response should be sent to Lori Cohen, U.S. Environmental Protection Agency, Superfund Branch, 1200 Sixth Avenue, HW-113, Seattle, Washington 98101. Please direct EPA policy and technical questions to Lori Cohen at (206) 442-2712, and legal questions to Deborah Gates at (206) 442-1218.

I hope you will give this matter your immediate attention.

Sincerely,

Charles E. Findley, Director
Hazardous Waste Division